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CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIAUNITED STATES DISTRICT COURT  
BY *Ed* DEPUTY  
SOUTHERN DISTRICT OF CALIFORNIAUNITED STATES OF AMERICA,  
Plaintiff,  
v.  
Manuel JIMENEZ Verdugo,  
Defendant.Magistrate Case No.: *'08 MJ 2360*  
COMPLAINT FOR VIOLATION OF  
21 U.S.C. § 952 and 960  
Importation of a Controlled Substance  
(Felony)

The undersigned complainant being duly sworn states:

That on or about July 30, 2008, within the Southern District of California, defendant Manuel JIMENEZ Verdugo, did knowingly and intentionally import approximately 25.88 kilograms (56.94 pounds) of marijuana, a Schedule I Controlled Substance, into the United States from a place outside thereof, in violation of Title 21, United States Code, Sections 952 and 960.

The complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.

  
\_\_\_\_\_  
Special Agent  
Immigration and Customs Enforcement

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE THIS 31  
DAY OF JULY, 2008.

  
\_\_\_\_\_  
Jan M. Adler  
U.S. MAGISTRATE JUDGE

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**UNITED STATES OF AMERICA**

1       v.

**Manuel JIMENEZ Verdugo****STATEMENT OF FACTS**

This complaint is based on the personal observations, investigation, and information furnished to Bureau of Immigration and Customs Enforcement Special Agent Christina Johnson.

On July 30, 2008, at approximately 1745 hours, Manuel JIMENEZ Verdugo was in the preprimary lanes of the Calexico, CA, East Port of Entry. JIMENEZ was the driver of a 1982 Dodge 400 bearing Baja California, Mexico license plate BES8588. While conducting a preprimary roving operation with his Narcotics Detector Dog (NDD), Canine Enforcement Officer (CEO) J. Jones's NDD alerted to vehicle driven by JIMENEZ.

Customs and Border Protection (CBPO) A. Barnes was notified of the alert. CBPO Barnes received a negative Customs Declaration from JIMENEZ and requested that JIMENEZ turn off the vehicle. JIMENEZ nervously attempted to hand CBPO Barnes some fliers as he ignored CBPO Barnes commands. During a cursory inspection of the vehicle CBPO Barnes noticed fresh glue on the inside tire well leading to the rear backseat wall. CBPO Barnes escorted JIMENEZ into the secondary office while CEO Jones and CBPO Crawford took possession of the vehicle.

In secondary, a thorough physical search of the vehicle by CBPO Barnes revealed packages in the dashboard area and in a backseat compartment. CBPO Barnes removed one package. A presumptive field test indicated the contents of these packages to be marijuana. Eighteen (18) packages were discovered. The total weight of the packages was approximately 25.88 kilograms (56.94 pounds).

JIMENEZ was notified of his arrest and advised of his Miranda Rights, which he acknowledged and waved. JIMENEZ admitted knowledge of the controlled substance

*[Signature]*

1 and stated he was to be paid approximately \$800.00 for the smuggling venture.  
2 JIMENEZ was processed and transported to Imperial County Jail.  
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